

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**


**KAIFI LLC,**

**Plaintiff,**

**V.**

**VERIZON COMMUNICATIONS INC.;  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS; VERIZON SERVICES CORP.;  
VERIZON ENTERPRISE SOLUTIONS,  
LLC; VERIZON BUSINESS GLOBAL LLC;  
VERIZON BUSINESS NETWORK  
SERVICES, LLC; VERIZON CORPORATE  
SERVICES GROUP INC.; VERIZON DATA  
SERVICES, LLC; VERIZON MEDIA INC.;  
and VERIZON ONLINE, LLC,**

**Defendants.**



**Case No. 2:20-CV-280**

## Jury Trial Requested

## **DEFENDANTS' CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants Verizon Communications Inc.; Cellco Partnership D/B/A Verizon Wireless; Verizon Services Corp.; Verizon Enterprise Solutions LLC; Verizon Business Global LLC; Verizon Business Network Service LLC; Verizon Corporate Services Group Inc.; Verizon Data Services LLC; Verizon Media Inc.; and Verizon Online LLC (collectively, “Defendants”) submit this notice of party with financial interest.

Cellco Partnership D/B/A Verizon Wireless; Verizon Services Corp; Verizon Business Global LLC; Verizon Media Inc.; and Verizon Business Network Services LLC are each, directly or indirectly, wholly-owned by Verizon Communications Inc.

Verizon Communications Inc. is a publicly held company. No publicly held corporation owns 10% or more of the stock of Verizon Communications Inc.

Verizon Corporate Services Group Inc.; Verizon Data Services LLC; and Verizon Online LLC are each, directly or indirectly, wholly-owned by GTE Corporation. Verizon Communications Inc. owns 10% or more of the stock of GTE Corporation.

Verizon Enterprise Solutions LLC is no longer an active company.

Dated: November 5, 2020

*/s/ Deron R. Dacus*

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VERIZON SERVICES CORP.; VERIZON  
ENTERPRISE SOLUTIONS, LLC; VERIZON  
BUSINESS GLOBAL LLC; VERIZON BUSINESS  
NETWORK SERVICES, LLC; VERIZON  
CORPORATE SERVICES GROUP INC.;  
VERIZON DATA SERVICES, LLC; VERIZON  
MEDIA INC.; and VERIZON ONLINE LLC,*

CERTIFICATE OF SERVICE

The undersigned certifies that on this 5th day of November, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ Deron R. Dacus  
Deron R. Dacus